

JATTASHANKAR INDUSTRIES LIMITED

CIN L17110MH1988PLC048451

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POLICY ON PRESERVATION OF DOCUMENTS

[Under Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

01. PREFACE

The purpose of this document is to present a Policy of Jattashankar Industries Limited (Company) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 and Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR"). As per Regulation 9 of the Regulations, every listed company is required to have a policy for preservation of documents approved by its Board of Directors, classifying them as documents whose preservation shall be permanent in nature and documents with preservation period of not less than eight years after completion of relevant transactions. Accordingly, the Board of Directors of Jattashankar Industries Limited has approved this policy for preservation of documents/ records maintained by the Company either in physical mode or electronic mode on 13th February 2023.

02. PURPOSE

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

03. DEFINITIONS

"**Act**" means the Companies Act, 2013 and Companies Act, 1956. "Preservation" is maintenance of documents, files and records in usable form and to prevent from being altered, damaged or destroyed.

"**Records**" means recording of information in any form including data in computer systems, created, or retrieved and maintained by an organization or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.

"Company" means Jattashankar Industries Ltd.

"Board of Directors" or "Board" means the Board of Directors of Jattashankar Industries Ltd., as constituted from time to time.

"Policy" means policy on Preservation of records.

"Listing Regulations" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

04. POLICY:

a) LEGISLATIVE FRAMEWORK AND STANDARDS

- Companies (Preservation and Disposal of Records) Rules, 1966
- Companies Act, 2013.

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

b) MAINTAINENCE OF RECORDS

- The content and essential characteristics of digital records must remain unchanged through preservation.
- Digital records can be maintained in forms such as emails, web pages or database records, plus scanned versions of paper records that have been digitized in business processes.
- Physical records to be maintained in books and files.
- All digital and physical records to be saved at the registered / administrative office of the Company and no physical records can be migrated without permission of Company Secretary.
- A reproduction of any original record on microfilm or on any other medium shall be certified by a Director or the Company Secretary of the Company to be a true and accurate reproduction of the original of such record.

c) DISPOSAL AND DESTRUCTION OF RECORDS

- All records mentioned in Annexure A need to be preserved by the Company permanently during the entire life of the Company.
- All records mentioned in Annexure B which are temporary in nature must be preserved for not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed.
- Utmost care is to be taken to ensure that files are neither prematurely destroyed nor kept for period longer than necessary.
- The Company shall maintain a register as specified in Annexure C, wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Secretary or such other person as may be authorized by the Board for the purpose. Inspection of this register is restricted.

d) DISCLOSURE:

- This Policy will be communicated to all the employees and other concerned persons of the Company and be disclosed on the Company's website www.jsil.in.

5. AMENDMENT

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit or from time to time and the decision of the Board in this respect shall be final and binding.

6. POLICY REVIEW

This policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications and subject to necessary approval of the Board of Directors.

For Jattashanagr Industries Limited

SD/-

Jattashankar Poddar
Managing Director

Place: Mumbai

Date: February 04, 2023

Annexure A: List of documents to be preserved permanently

- a) Certificate of incorporation
- b) Certificate of change of name
- c) Common Seal
- d) Memorandum and Articles of Association as amended from time to time
- e) Minutes Book of Board, General Meetings and Committee Meetings,
- f) Statutory Registers
- g) License & Permissions
- h) Register of members
- i) Index of Members
- j) Listing Agreement
- k) Central Government Approvals Received, if any
- l) Any other Document / Information / Record as per the provisions of any other applicable Law or Regulation to the extent applicable to the Company.

Annexure B: List of documents to be preserved for not less than 8 years

- a) Annual Reports,
- b) Annual Returns,
- c) Consent and Resignation Letters received from the Directors
- d) Board Agenda and supporting documents,
- e) NSDL/CDSL Files
- f) Attendance Register,
- g) Annual financial statements including:
 - Annual Accounts
 - Director's report
 - Auditor's report
- h) Office copies of Notice of General Meeting and related papers,
- i) Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda, and other related papers,
- j) Declaration by directors under section 164 of the Companies Act, 2013,
- k) Declaration by directors under section 184 of the Companies Act, 2013
- l) Instrument creating a charge or modification,
- m) Books of accounts, financial statements etc. and
- n) All documents under the Listing Agreement
- o) Advertisements published
- p) Scrutinizer Report
- q) Disclosure to be made to the stock exchange under regulation 30 of the listing regulations
- r) Following registers are not to be maintained permanently-
 - Register of Deposits
 - Register of allotment
 - Register of Payment of Dividend
 - Register of Proxies
 - Register of Inspection
 - Register of Investor Complaints
 - Register of Postal Ballot